

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF BENJAMIN ARROYO

I, Benjamin Arroyo, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center occurred. At the time of these horrific events, I worked as a doorman in the lobby of World Trade Center 3, also known as the Marriott World Trade Center Hotel (Marriott). Attached as Exhibit B is a true and correct copy of my proof of employment with Marriott International as a doorman at Marriott during the events of the 9/11 terrorist attacks.

4. When the first passenger jet struck the North Tower, I had been standing in the lobby of the Marriott. After I heard the massive explosion in the nearby area, I stepped out onto West Street in an attempt to determine the cause of the blast. As I walked through the street, I saw horrific scenes of people jumping from the North Tower and exploding as they hit the pavement below. I attempted to assist a man that I found nearby who had been engulfed in flames. As

another man walked by me (apparently covered in jet fuel), he was in shock and had no skin on his body. I tried desperately to assist those around me who had been injured.

5. As soon as the second passenger jet struck the South Tower, my location near the Twin Towers became a scene of chaos, bloodshed, and hysteria. I then realized that the World Trade Center had been deliberately attacked by terrorists.

6. To escape the carnage near the World Trade Center, I decided to run towards the Hudson River area. I then heard a thunderous sound and I felt the earth shake. I turned around to and watched as the South Tower collapsed. I watched in horror as people ran in all directions away from the South Tower, but many became buried in the building rubble. A grey cloud of smoke, dust, building debris, and chemicals then surrounded me, and I inhaled large quantities of these substances, damaging my lungs and respiratory system. Further, as I attempted to flee the area towards the Hudson River, I fell several times and I severely sprained my ankle. Despite my injuries, I continued to run away from Ground Zero to escape the carnage.

7. I then walked for hours, as if I were having an out of body experience, replaying in my mind the horrors I had witnessed. While I felt extreme pain in my ankle region, I continued to walk in a daze around the city. I felt detached, afraid, sad, and isolated. I made efforts to communicate with my family, but I could not reach them. At some point, I decided that I had to get to my home in the Bronx.

8. When I finally arrived at my home, I felt extreme pain in my ankle region, and I had trouble breathing due to the dust and debris that I had inhaled. Although I was incredibly relieved to see my family and I hugged and kissed my wife and daughter, I felt numb inside and I did not engage in conversation. Instead, I lay in bed in the fetal position and cried for hours.

9. For weeks after the 9/11 attacks, I could not retain information and I had difficulty with my short term memory. I had frequent headaches and a stomach disorder, and I continued to experience shortness of breath and other respiratory issues. I also continued to experience intrusive thoughts and uncontrollable crying spells.

10. Due to the chemicals, smoke, dust, and building debris that I inhaled on September 11, 2001, I suffered from and continue to suffer from lung nodules, respiratory infections, shortness of breath on exertion, RADS, headaches, chronic sinusitis, extrinsic asthma, chronic rhinitis, gastroesophageal reflux, stomach disorders, sleep apnea, asthenia, and short term memory loss. Further, I suffered a broken ankle while escaping from Ground Zero, and I also experienced right knee joint effusion. Finally, I have been deemed totally and permanently disabled due to my experiences on 9/11 as described above.

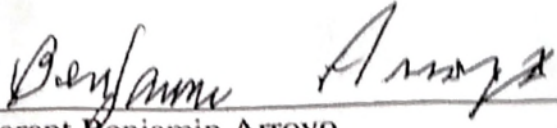
11. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

12. I sought and continue to seek medical attention for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001, terrorist attacks.

13. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF Number 212-002517) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 6th day of June 2021.


Declarant Benjamin Arroyo

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**